

**Council for Licensed Conveyancers** 



www.clc-uk.org



## Strategy

## **Empower consumers to make informed choices of conveyancing** and probate lawyers

- Price and service information is more easily accessible and comparable in line with the CLC's Action Plan in response to the Competition and Markets Authority's recommendations on information remedies in legal services
- CLC firms with the best ratings from consumers will increase their transaction volumes

## Adapt regulation to the changing market

- No regulatory failures will arise as a result of new technological innovations or business models
- We will adapt our regulatory approach in response to changes in the market for specialist conveyancing and probate services
- Innovative practices will agree that being regulated by the CLC is either 'extremely' or 'mostly' beneficial to their business

## Be the regulator of choice in our specialist areas

- Firms agree that being regulated by the CLC is either 'extremely' or 'mostly' beneficial to their business
- The share of the conveyancing market (in terms of numbers of transactions) under CLC regulation continues to grow



Dame Janet Paraskeva

## Foreword

2019 has been a year to be proud of. The Council for Licensed Conveyancers (CLC) has increased the confidence clients place in the firms we regulate, we have intervened in practices that would have put clients at risk, we have safeguarded their investments through our compensation fund and at the same time managed to reduce significantly the regulatory fee rates we charge.

The effectiveness of the Council for Licensed Conveyancers, which I chair, relies on the broad range of experience and expertise demonstrated by our Council Members working alongside our Senior Management Team, led by Sheila Kumar. The Council consists of lawyers and independent members, and has a lay majority. The Senior Management Team work hard to ensure that the Council has detailed insight into the policy and operations of the regulator so that we are able to challenge, advise and support the organisation effectively.

We publish our papers, and these show the detailed nature of the information provided to the Council. In 2019 we looked again at our publication policy and this resulted in an even more open approach to publication of information, increasing the transparency of our work. We are now also able to link to disciplinary information on individuals and firms direct from our online register. Taken together, these steps add to the confidence that the regulated community and the wider legal sector, consumers of legal services and the general public can have in the CLC.

## Our approach to regulation: assisted compliance

Our twin purposes are to provide high standards of consumer protection and to promote competition and innovation, supporting the development of thriving businesses. The Council and Staff teams work well together to deliver this through a model of regulation unique in the legal sector.

The CLC's Regulatory Supervision Managers (RSMs) take the lead in our close relationship with the practices and individuals that we regulate. But the work begins with the Licensing and Authorisations team that is the gatekeeper for regulation by the CLC. The rigour of our approach to allowing new businesses and individuals into CLC regulation sets a high bar and the RSMs work closely with firms to ensure high standards are maintained. The practices we regulate know that their dedicated RSM is on hand to offer advice and support. They also know that the inspections carried out by the RSM team will clearly identify any shortcomings. When those are found, the RSMs set short timetables for firms to come into compliance. Where there is a significant failing or clients are at immediate risk, then disciplinary action or even intervention into a firm might become necessary.

This approach benefits the clients of those property and probate lawyers, as the CLC's specialist regulation focuses on the risks particular to conveyancing and probate. A good example are our new rules to improve the quality of information available to consumers to help them choose their lawyer. These came into effect in December 2018 and by the end of the first quarter of 2019 all firms were in compliance with them, thanks to the intensive action of the RSMs.

The regulated community has embraced what we have called the Informed Choice agenda positively so that now, home buyers and sellers considering using a CLC-regulated firm are able easily to compare price and service details as they make their choice. More and more firms are also using platforms such as Trustpilot or Google Reviews as a guide to the quality of service that they provide as judged by past clients. There are longer-term benefits of our regulatory approach too, because of the insight we have into the future evolution of conveyancing and probate services. In addition to our frequent contact with firms, that insight is also built on analysis of detailed information provided annually by regulated practices through our compulsory Annual Regulatory Returns and Accountants Reports as well as workshops and roadshows and our active participation in a wide range of groups working to develop conveyancing, probate and legal services regulation. Our new Professional Reference Group, made up of senior practitioners, also provides an invaluable perspective and challenge on potential changes in the sector.

## **Our Adjudication Panel**

The CLC's Adjudication Panel hears disciplinary cases brought by the CLC against Licensed Conveyancers and Probate Practitioners who we regulate. It is independent of the Council. I would like to thank Emma Boothroyd, whose term as Chair of the Adjudication Panel ended during 2019 and welcome Victoria Goodfellow, who has been appointed to take her place. I would also like to thank the other outgoing members, Ian Melville, John Wilson, Ed Percival, Richard Morris and welcome new members Catherine Fewings, Helen Riley, John Jones, Paul Brooks and Robert McKellar who join continuing members Carolyn Tetlow and Harsha Hildebrand to carry out the Panel's important work.

I know that Victoria has already begun to look at how the Panel works to be as effective as it can be and the CLC will support her and the other panel members as they take that work forward.

## Looking ahead

As I write, we are entering the third year of our five-year strategy. As this report shows, we are making good progress against the ambitious goals that we set ourselves back in 2017. Those goals were based on careful consideration of a great deal of evidence, but this is a fastmoving sector and research we have planned for the year will provide further helpful insight into our impact and allow us to check our direction of travel.



Sheila Kumar

## Introduction Delivering on our strategy

This Annual Report looks at the calendar year 2019, the second of our five-year strategy. While we maintain and extend high standards of consumer protection, that strategy commits the CLC to:

- 1. Empowering consumers to make informed choices of conveyancing and probate lawyers
- 2. Adapting regulation to the changing market

3. Becoming the regulator of choice in our specialist areas

While the main body of the report covers them in more detail, I would like to highlight some of the key achievements in 2019 against each of those objectives.

First through, it is important to review the overall financial picture.

## Managing our resources and the regulatory burden

The CLC is obliged to take a proportionate approach to regulation and to not place a financial or compliance burden on the regulated community that is out of kilter with the risks we need to address.

We seek to be as efficient as we can and this enabled us reduce our regulatory fee rates in 2019, supporting our strategic goal to reduce the regulatory cost burden on CLC practices in a way that is sustainable for the foreseeable future. This significant 30% cut in regulatory fee rates comes after a period of other, small annual reductions that have together made a very significant change in the costs of those we regulate. The move reflects the effectiveness of our specialist regulation in maintaining high standards of compliance, as well as careful budget management and the desire to reduce our reserves to their appropriate level.

We can control our own rule book and our own costs. However, there some costs that are simply outside the control of the CLC.

The CLC is obliged, as part of our regulatory fees, to collect money that is passed on to fund the Legal Ombudsman, the Legal Services Board and the Legal Services Consumer Panel. That accounts for around oneguarter of the money that we collect from the regulated community. The vast majority of this goes towards funding the work of the Office for Legal Complaints (OLC). The OLC's annual levy on the CLC far outstrips the costs of complaints handing when it was managed in-house at the CLC. With the OLC proposing a further increase in funding for the coming three years, we will continue a conversation with them and the Legal Services Board about how to get best value from that funding.

#### **Empowering Consumers**

I chair the Remedies Programme Implementation Group that brings together all of the legal sector regulators to improve information available to consumers as they make their choice of lawyer. In line with our first strategic objective, the CLC has led the sector in this work, not only by being one of the first regulators to issue new rules around, but by securing 100% compliance with those rules within three months of launch in early 2019. Later in the year, we began to look at the question of quality measures that could be used to further inform consumer choice. Our Professional Reference Group held a useful initial workshop that will inform our collaboration with the Legal Services Board and other regulators to develop a sector-wide approach.

## **Adapting Regulation**

As every year, we have evolved our approach in the light of the changing market, pressures on the regulated community, our insight into new and emerging risks and our increasingly well-informed risk-assessment of individual firms.

In the early part of the year we held a series of workshops with lawyers across the country to look at what changes we might need to make to our Accounts Code. Safeguarding client money is of course central to a property or probate lawyer's duties and we aim to ensure that our Accounts Code addresses current risks and those future risks that we can foresee, as well as taking advantage of new opportunities. A revised Accounts Code, which makes a number of changes, including specific provision for Third Party Managed Accounts, will be considered by the Council in 2020 following our 2019 consultations.

In 2019 we placed particular emphasis on anti-money laundering policies and practices in firms. Regulatory Supervision Managers engaged closely with the regulated community and we also provided training for Money Laundering Reporting Officers to improve standards of compliance across the sector. As in all that we do, our approach was one of assisted compliance, as outlined by Janet in her foreword. Along with our tailored rulebook, this aims to help Licensed Conveyancers and Probate Practitioners meet the standards we expect because we know that is what the vast majority of practitioners want to achieve. However we do not hesitate to take action where firms are failing consistently to meet those standards or there is significant risk to clients.

In 2019, we had to intervene into three regulated entities because of breaches of our Code of Conduct that the practices failed to address and which represented real and immediate risk the clients of those firms.

These decisions are often taken quickly because of the imperative of client protection, but they are based on careful and detailed consideration of the evidence and are not entered into lightly. An intervention can be very resource intensive, especially because of the care we take to ensure that live transactions are progressed with the absolute minimum delay.

The lessons we learn from dealing with any breaches of the Code of Conduct, and especially the most serious, are fed back into our day to day operations and help us to work with firms to address problems early on before they become critical. They also feed in to our reviews of our rules and guidance to ensure that we remain tightly focused on the real risks in conveyancing and probate.

## Becoming the Regulator of Choice

Our unique market insight allows us to future-proof our regulatory approach and ensure that we are able to respond nimbly to emerging risks and opportunities. Our rulebook is tailored to the specific legal services that are our focus.

Since it first became possible in 2018, ten specialist conveyancing practices have chosen to move their operations into CLC regulation from other regulators. Given the rigour of the process for acceptance by the CLC and the work that such a step entails, this is a great vote of confidence in our approach.

Our strategy aims to deliver growth in the market share of conveyancing and probate under regulation by the CLC because we believe that our model serves consumers and the legal sector well. As we enter the third year of our five-year strategy, the Council and Staff will continue to work with the regulated community to exploit to the full the benefits of our model of regulation of specialist property and probate lawyers.

# The Regulated Community





## **Entity Type**

CLC practices provide their services through a range of models (such as sole principals, partnerships, LLPs, limited companies and equity funded). Some practices provide specialist services within a wider group structure, providing for example, a combination of legal, financial and/or professional services.

At the end of December 2019, 77 were Alternative Business Structures, meaning that they have some degree of non-lawyer participation. This could be in the form of external investment or having non-lawyers (e.g. finance, HR or marketing professionals) as managers or directors of the business.

## **Total Turnover**

The chart below looks at the reported turnover of all firms within CLC regulation each year since 2002/03. As is clear, total turnover growth has been considerably faster since the 2007 downturn than in the years leading up to it while overall the number of firms under regulation has been fairly stable despite closures and openings of firms each year. There is a general trend for turnover to be concentrated increasingly in the larger firms. There has been a spike in smaller practices closing following the change to Professional Indemnity Insurance (PII) terms from July 2016 which has meant that where there is no successor, practice insurers will provide six year run-off cover of £2M in aggregate at no additional cost to the practice at point of closure. This is a considerable enhancement of consumer protection.



Practices by entity type	Total	Of which ABS
Limited Company	166	72
Limited Liability Partnership	16	5
Partnership	11	0
Sole Practitioner	35	0
Total	228	77

#### **Annual Regulatory Return**

In 2019 we again carried out our annual wide-ranging survey of the regulated community to deepen understanding of the market that we regulate. The full report of that Annual Regulatory Return (ARR) has been published and the ARR is repeated annually so that we can continue to enrich the data we hold and are able track trends in the market place. Some key findings are set put below.

Practices were asked to report the proportions of transactions conducted in areas of work they carried out. The report found that the proportion of transactions conducted in each business area was very similar to the 2018 Return:

Residential conveyancing	Re-mortgaging	Commercial Conveyancing	Will-writing	Probate	Equity release	Other
84%	7%	9%	10%	12%	2%	11%

## Acting for both sides in a transaction

Practices that conducted residential and / or commercial conveyancing were asked to report the proportion of transactions where they acted for both sides of the transaction. The proportion of transactions (%) where firms acted for both sides is below:

0%											l work for one side only
3%	42%	9%	3%	2%	1%	<1%	0%	0%	0%	<1%	39%



## **Business risks**

Firms were asked to report the greatest business risks they expected to face over the next 12 months.

The top three anticipated risks were: 18/19 17/18



Brexit - current and future effects ● 30% ● 19%



Cybercrime • 26% • 22%



Fraud / money laundering ● 25% ● 34% Just over one-quarter (28%) of all firms reported that they felt pressure to reduce prices charged to clients for their services. On the whole this pressure did not translate into behaviour, with only 4% of conveyancing firms reporting that they decreased the prices charged for their services during the past year; and

2018/19;

Since the introduction of the new transparency rules around onequarter of firms (26%) felt that clients have shopped around more (either a great deal or slightly more), while the just over half (54%) thought there had been no change. Very few firms (2%) felt that clients had shopped around less.

## Other findings included:

A similar proportion predicted that their volume of work will grow over the next 12 months (45%) as predicted it will stay the same (42%);

The majority of firms reported that their prices remained the same compared to the preceding year. Around two-fifths of firms that carry out conveyancing reported an increase in their prices charged in



## Strategic Objective: Be the Regulator of choice



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Our unique market insight allows us to ensure we are able to respond nimbly to emerging risks and opportunities.



Our regulatory approach is designed to support clientfocused and innovative property and probate lawyers through what we call 'assisted compliance.' We work on the basis that prevention is better than cure and use a wide range of approaches and tools, engaging closely with CLC Practices to ensure compliance and take corrective or disciplinary action where it is necessary.

The journey begins for an individual with qualification as a CLC property or probate lawyer. For businesses it starts with registration as a CLCregulated entity and then through close monitoring by our Regulatory Supervision Managers working within our model of assisted compliance. The basis of our approach is set out in an appendix at the end of this report.

We are committed to the long-term success of the firms we regulate. This means we work alongside practices to support them to provide modern legal services that benefit consumers.

Below we look at the work we undertook in 2019 to deliver our strategic objectives and improve our services to consumers and the regulated community.

## Education, Training and Apprenticeships

Our outsourced approach to the delivery of education to achieve qualifications that pave the way to becoming a Licensed Conveyancer and Licensed Probate Practitioner is now well established. Under the oversight of the Scottish Qualifications Authority (SQA), our providers are ensuring that students receive the skills and knowledge they need to succeed as CLC technicians and lawyers and is increasing the pipeline of fully qualified technicians and lawyers to meet increasing demand from employers.

Training is delivered through colleges, private providers and employer centres: Access Law Online Damar Training LTC (Law Training Centre) Kent MOL (Manchester Online Learning) Professional Vocational Training Ltd The Manchester College

Convey 365 JS Law

My Home Move

Conveyancing firms continue to be keen to recruit specialist qualified property lawyers and technicians. We are also liaising with apprenticeship providers and SQA in their efforts to support employers and employees to access the CLC graduate apprenticeships.

We celebrated with those individuals qualifying as CLC lawyers and technicians at our national graduation ceremony in Manchester hosted by the Chair of the CLC Council. Graduates at the event gave positive feedback on their experience as students as well as the employment



advantages that have opened up to them since qualifying as a CLC lawyer. Attendees came from a wide range of businesses including CLC and SRA regulated business.

Student numbers continue to grow steadily and a new training provision in Wales will provide support for prospective CLC lawyers and regulated businesses based in Wales. The first level 6 Apprentices completed their apprenticeship in late 2019 and a further 150 apprentices are working toward completing their apprenticeships in 2020 and 2021.

The apprenticeship route offers an accessible way to qualify as a CLC Lawyer at no cost to the candidate. During the next year we will be seeking to review the experience of individuals and their employers so we can ensure that apprenticeships and the way they are delivered is provided in an optimum way.

The distance learning route continues to be the most popular method of study and as a result of a new training provider joining the market we anticipate students will benefit from an increased choice in the types of study programme that are becoming available.

## CASE STUDY:

Bronwen Maclean went from waiting tables to becoming a property lawyer in less than two years. She is a Licensed Conveyancer at Humble & Clark Legal Services in Hexham, Northumberland.

"My parents own a pub, so since the age of 14 I have worked in the hospitality trade. After completing my GCSE's and A/S levels, I wasn't sure which career path to follow so I continued working in hospitality after leaving school. However, the hours were unsociable and with a young daughter to care for I wanted to work in a more family friendly environment.

"In September 2016 I found a part-time administrative role at Humble & Clark and I haven't looked back since. The partners at Humble & Clark thought I showed a great aptitude for the conveyancing process and I had plenty of experience of dealing with the public given my previous employment. Soon after joining the firm, and with the full support of the partners who funded my studies, I began the Level 4 Diploma in Conveyancing Law and Practice, followed straight away by the Level 6 qualification. It took me 19 months to qualify, which I am told is very quick. But that's the beauty of the course, because it is distance learning you can go at your own pace.

"Just because the course is distance learning, doesn't mean there's a lack of support. You are given a tutor who you can contact at any time and there is a well-used online forum where students will often post unusual or tricky issues that they're dealing with in their day job. So, there were plenty of real-life examples to learn from. Plus, I had the support of my work colleagues; I was always able to ask questions at work and being able to put things from the course into practice in the office really helped cement my learning. I think that is why I was able to qualify so quickly.

"I'm 26 and now run my own residential conveyancing caseload. My plan is to keep working hard and I hope eventually I can make partner in the business."



## Managing Entry to the CLC Regulated Community

The CLC sets a high bar for entry to its regulated community. Lawyers qualify as a Licensed Conveyancer or Licensed Probate Practitioner.

Experienced lawyers who have qualified by other routes (e.g. Solicitors, Fellows of CILEx) can apply to be licensed as CLC lawyers.

Lawyers, beneficial owners and nonlawyers who are Directors, Partners or Members in a CLC Practice must also satisfy our fit and proper person test and complete standard AML checks. There is more detail on this in the appendix. Businesses seeking to transfer into CLC regulation from another regulator are subject to the same rigor together with additional compliance checks with their current regulator.

2019 saw more businesses taking advantage of the freedom to choose to move to a specialist and proportionate regulatory regime. An important driver for the promotion of competition in the provision of legal services, one of the regulatory objectives in the Legal Services Act 2007. Businesses seeking to become regulated by the CLC are encouraged to contact our Licensing Team so we can explain the process, likely timescales and agree expectations. Our approval process is outcomes focused and is centred on consumer protection. In our experience practices take advantage of moving to regulation by the CLC to transform their business model, setting ambitious targets for sustained business growth. In recognition of

the time this takes, we encourage

applicants to determine the pace

so properly consider the types of

The first trading year under new

regulation is critical and when

Regulator Supervision Manager

changes that benefit and strengthen

Practices most look to us for support.

Every CLC practice has a nominated

(RSM) who acts as the key point of

contact, especially in the first year of

regulation. The RSMs help business

owners and managers to become

familiar with the CLC's regulatory

our compliance framework.

framework and Codes of Conduct so

they can operate the business within

of the application process and

their business.



## Licence Renewal

In 2019 we continued the streamlining of the licence renewal process begun in 2014 to reduce the regulatory burden on CLC Lawyers and Practices. We retained and enhanced the digital declaration and direct invoice systems introduced in 2018 which made the renewal process easier to understand and complete. We received fewer queries and completed renewals much earlier and in a much shorter period than under the previous system.

In a feedback survey of the regulated community 96% of respondents rated their experience of licence renewal in 2019 as either 'good' or 'very good'.

The licence renewal process is a useful checkpoint to remind practitioners of their responsibilities and duties and to ensure that all changes have been reported to us over the course of the year.

## Monitoring

In 2019 we undertook 58 monitoring inspections against a plan for 67. 56 of these visits were routine inspections (each practice has a monitoring inspection at least once every three years) and 2 were targeted inspections triggered by our own knowledge of the firm or intelligence received. These were undertaken by CLC staff and by appointed inspectors working to the same procedures. Some planned inspections had to be postponed owing to the number and complexity of interventions this year, but these practices will be inspected in 2020.

The majority of the routine inspections resulted in the regulated entity being required to take some remedial action to address minor areas of non-compliance. These were addressed by the practice in line with the expectations of our Regulatory Supervision Team.

The insight gained from monitoring is fed back to practices by our RSMs to help raise standards of practice as well as informing the development of new policy and compliance support materials.



## Professional Indemnity Insurance Arrangements

Ahead of expiry on 30 June 2019, all CLC firms which wished to do so were able to renew their PII cover with PII insurers signed up to the Participating Insurers Agreement (PIA), first introduced in 2016. This ensures continuing enhanced protection for consumers and benefits for regulated entities.

Under the PIA, PI insurers must provide run-off cover to CLC firms when they close at no additional cost. The six-year run-off cover is subject to an aggregate £2m limit.

Run off cover gives consumers excellent protection by removing the risk that a firm will close without taking out run- off cover because the cost is too high and reduces the exposure of the Compensation Fund that we manage on behalf of the regulated community. We are in regular contact with the PII insurers to assure ourselves of the effective operation of the scheme.



## **Compensation fund**

The CLC operates a Compensation Fund as a fund of last resort for clients who have suffered financial loss at the hands of a CLC-regulated firm or individual that is not covered by professional indemnity insurance. This is funded by the regulated community. A report on the Compensation Fund will be included in the CLC's Annual Financial Statements 2019.

During 2019 the CLC consulted on cuts to Compensation Fund contribution rates. Following approvals by the LSB rates were cut by 60% for the licensing year starting 1 November 2019.



#### Supporting compliance

Throughout 2019 we have continued to work closely with our firms to support them in their ability to comply with our rules.

In January we held our Annual Conference, which had several sessions focusing on different aspects of compliance. Eight out of ten of who attended said they would definitely take part again next year.

In May and June we supported the Society of Licensed Conveyancers by presenting to their roadshows, talking to attendees a range of compliance issues.

Later in the year, in October and November, we ran a series of AML roadshows (see more in the AML section) and also ran a series of compliance workshops for our own licensed community.

We also ran a successful webinar with the Legal Ombudsman. Feedback is that participants find these a helpful way of receiving information and we know that individuals continue to return to view them after the original broadcast. We will explore how we can provide more webinars in 2020.

Our website continues to be enhanced as a core resource for practices and lawyers to support compliance through toolkits, good practice material and a range of guidance.



## Anti Money Laundering

The National Crime Agency and Government continue to identify money laundering as a risk to the UK economy with conveyancing and the use of client accounts rated as high risk. The last year has seen an ongoing effort to support our licensed community to understand and fulfil their anti-money laundering (AML) obligations.

In accordance with our obligation under the Money Laundering, Terrorist Financing, and Transfer of Funds (Information on the Payer) Regulations 2017 (MLR) the CLC has now completed risk profiles for all eligible Regulated Practices. The CLC Risk Register calculates a risk score based on information collected either during onsite inspections or from an AML guestionnaire issued to practices. 129 practices have been inspected onsite in 2018 and 2019, and the AML questionnaire was sent to 110 practices not scheduled to be inspected in this period. The risk register has allowed us to target our resources and support practices into compliance. Between the time of inspection or questionnaire and the end of 2019, the number of practices assessed as non-compliant with the MLRs fell from 74 to 5 with the rest becoming compliant.

The risk register identified a lack of enhanced AML training for Money Laundering Reporting Officers (MLRO) as one of the main reasons for non-compliance, leading to a high risk rating. In response, the CLC ran a series of seven AML roadshows targeted at MLROs in October and November (in Leeds, Birmingham, Bristol, and two each in London and Manchester) with a total of 124 practices attending.

We provided ongoing support for Practices through a plenary session at our Annual Conference with a senior speaker from the Home Office and the UK Finance lead for the SARS Reform Programme. We have also continued our support through 2019 for the Government's Flag it Up Campaign and provided material for their partnership with *The Times* as well as input into the content and production of case studies and video animation. We have also developed and enhanced web based material in our AML Toolkit. The CLC also supported the National Economic Crime Centre and HMRC coordinated Joint Supervisory AML week of action in April.

We also provided AML training to CLC employees, with two half-day training sessions delivered by an external provider, induction training developed and delivered to all new starters, and the majority of staff attending one of the MLRO enhanced training road shows. The CLC has also been preparing for the introduction of the Fifth Money Laundering Directive (5MLD) in January 2020, including contributing to the Legal Sector Affinity Group's (LSAG) revision of the Treasuryapproved Legal Sector AML Guidance (to be published in 2020).

The CLC continues to engage with government, supervisors, regulators, and law enforcement by attendance at the Legal Regulators AML Forum, the AML Supervisors Forum, LSAG, the Legal Sector Intelligence Sharing Expert Working Group, and at conferences and events.

We had the first two quarterly bilateral supervisory meetings with the Office for Professional Body Anti-Money Laundering Supervision (OPBAS). The CLC maintains a positive relationship with OPBAS and received positive feedback both about its performance as an AML supervisor and on progress against the agreed AML Action Plan.



## **Diversity and Inclusion**

In February, the CLC initiated a diversity monitoring survey of the community it regulates. The results published in May showed a diverse workforce, founded on a profession that can be entered via a range of non-graduate routes.

The research showed that men are twice as likely as women to be in a managerial role. This is despite women making up the vast majority (74%) of the Licensed Conveyancers community. Women were nearly twice as likely as men to be employed as salaried lawyers or administrators.

While overall participation in the CLC-regulated community by those from BAME backgrounds (14%) was broadly in line with the national figures, those from ethnic minority backgrounds were less likely to hold a licence from the CLC or another regulator. Similarly, staff who identified as White or White British (84%) were more likely to be in managerial roles than BAME colleagues.

The survey also explored the characteristics of the CLC Council Members and staff and the results of that can be seen in the Governance section later in this report.

Following receiving the results of the survey the CLC began work to see what it could do as a regulator to have more impact and better promote diversity and inclusion.

In the last guarter of 2019 all CLC Council Members and staff completed a short diversity and inclusion training course.

The CLC has a regulatory objective to promote diversity and inclusion across the regulated community and in 2020 it will be considering what steps it can take to support that effort and whether any changes are needed to the Equality Code that sets out our expectations of the regulated community in this area.

# **Empower Consumers** to make Informed



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We believe that providing clear information to consumers makes good business sense.



CLC | Regulating Property And Probate Lawyers 19

## Empower consumers Informed choice to aid consumer decis

## Informed choice to aid consumer decision making

This year has seen the first year of Practices operating within our Informed Choice transparency requirements which came into effect 6 December 2018.

As a regulator we believe that providing clear information to consumers makes good business sense. We want CLC Practices to see the changes as providing them with new opportunities to create a competitive advantage as they focus on service and quality.

The changes aimed to empower consumers to make better informed decisions about their choice of legal service provider. The new requirements also aimed to foster innovation and competition in the legal services market. We have always been clear that we made the minimum changes to our rules to allow the greatest flexibility to our practices. We acknowledge that all CLC Practices are different, so this allows them to comply with the requirements in the way that best suits their business and their clients.

Our Regulatory Supervision Managers worked closely with practices to ensure compliance and we were able to report that during 2019 all CLC Regulated Practices were complaint with the requirements. We continue to monitor how well the new rules are working as well as seeking to understand the impact they may be having on practices and consumer behaviour.

Analysis of data submitted by all Practices as part of the Annual Regulatory Return (ARR) (completed by all the practices that were licensed by the CLC for the full twelve-month period covered) showed that the feared race to the bottom did not happen with 37% of firms saying they had increased their conveyancing prices in 2018/19 with only 4% reducing them, even though 28% reported pressure to do so. And similarly 34% reported they expected to increase prices in the coming year with only 3% expecting to reduce them.

The CMA have said that they will be evaluating the changes during 2020 and in the meantime, according to ARR data, since the introduction of the transparency rules, some 27% of practices felt their clients were shopping around more.

We will continue to look at whether there is additional useful information that should be provided to consumers. In 2020 we will actively work to see what may be possible to develop indicators of quality.



At our Conference in January 2019

we announced a consultation on a

of the new Charter is twofold:

something goes wrong.

new Customer Charter. The purpose

emphasising the specialist nature of

customers know they are protected if

CLC practices' services and letting

The Charter creates an opportunity for regulated practices to attract and reassure consumers, while they are still choosing their conveyancer, about what to expect from using a CLC Regulated Practice.

It is also a way of demonstrating that the specialist property lawyers at the CLC Practice are bound by a Code of Conduct which sets out the regulatory responsibilities of all practices (and individuals) regulated by the CLC.

The Charter was launched to practices in autumn 2019 and consumer focused promotional activity will take place throughout 2020 and beyond as a key support for public legal education.

Feedback from the consultation was uniformly positive about the idea of such a document.

The Charter has been developed to:

- Enhance our public legal education objectives by reinforcing the benefits to the public of using a regulated legal service provider
- Strengthen understanding for the public of the protection they receive from using a CLC regulated practice
- Emphasise the specialist nature of CLC regulation and CLC-regulated practices; our commitment to transparency and the protections available to customers.





## **Legal Choices**

Legal Choices is a consumer-facing website funded and delivered jointly by the front line regulators of legal services. Its two main aims are:

- to help equip people with the information they might need to make good choices about lawyers and legal services, and
- to give people more ways to get their views heard and play a stronger role in the work of legal regulators.

Throughout 2019 we have been working jointly with the other frontline legal regulators to significantly increase the reach and impact of the website. We have provided new content for the site along with playing an active role in developing new products to increase the scope and reach of the site.

Work on Legal Choices is now at a critical point as we begin to be able to measure the impact it is having on consumers of legal services and value for money of the approach that has been taken.



## Fraud and cybercrime

Cybercrime is the fastest-growing crime in the country, accounting for more than 75 percent of all reports to the police. Law firms, handling large amounts of client money, are prime targets for such criminals. Fraud continues to be seen as a major risk both for the practices we regulate and their clients. The 2018/19 Annual Regulatory Return found that one in five firms had stopped at least one instance of attempted fraud in the year covered while the number and variety of attacks on conveyancers increased. In that period 12 practices reported having been the victims of fraud.

During 2019 the CLC has continued to take steps to reduce the risk of fraud faced by CLC Practices and their clients. We have continued to develop and share material for Practices and consumers to help protect against the risk of fraud.

We have also used our newsletters, website and social media to warn of potential scams

We have continued to support and promote the Take Five to Stop Fraud Campaign, encouraging firms to join the campaign and raise awareness of types of fraud risk. We have also used campaign assets to help lawyers and clients protect themselves from fraud.

As part of our new transparency requirements our rules were amended to make the use of the CLC Secure Badge mandatory on the websites of all CLC Practices following a long period of voluntary use. Following the introduction by the CLC of the badge a number of other frontline legal sector regulators have introduced similar schemes because the Competition and Markets Authority were impressed by the innovation we had made.

The badge helps to protect lawyers and their clients by making it more difficult for fraudsters to imitate real law firms online or create fake law firms. It also allows consumers to check the regulatory status of a firm they are considering instructing and leads them to the CLC website where they can find more information about how to raise complaints and seek redress.



## **Public Legal Education**

One of the main ways the CLC has of developing consumer understanding of conveyancing as well as helping consumers protect themselves from risks such as fraud and cybercrime is through our website and social media channels. New content has been developed this year to support better understanding of why those involved in house buying and selling are required to fulfil identification and verification processes as well as providing proof that funds are from a legitimate source.

Recognising that there are certain terms that all professionals involved in the home buying process use frequently that may not be understood by the consumer we produced a guide to the most common terms and what they mean. These have proved popular being shared widely via our social media channels

## Strategic Objective: Adapt regulation to the changing market



"

We anticipate, prepare and respond to protect consumers and support thriving and innovative businesses.







## Adapt regulation to the changing market

Our aim is to anticipate, prepare for and respond to;

- movements in the property market,
- changes in the way legal services are delivered, and
- evolution in the profile of risks to clients.

This work is vital to our mission to protect consumers and our commitment to support thriving and innovative businesses.

We gather intelligence and insight from;

- our inspections of firms,
- the mandatory Annual Regulatory Return that covers the full range of our regulated entities' activity and compulsory Accountants Reports, and
- informal visits to firms and discussions with their suppliers, lenders and others in the property market
- consumer research
- running our own and attending others' conferences.
- other research we undertake ourselves or in collaboration with others.

In 2019 the key external factors that have influenced how we achieve our objectives include;

- the ongoing uncertainty in the economy and the housing market arising from lack of a decision on Brexit
- evolving patterns of fraud
- work across the sector to transform the home buying and selling process
- the continuous development of innovative solutions to risk in conveyancing transactions.

## The ever-changing property market

We constantly track economic trends and property market data and insight from sources such as the Bank of England, HM Land Registry, the major mortgage lenders, RICS and the EY Item Club among many others. The intelligence derived from this tracking is provided to our staff and governing Council to inform our risk-based approach to regulation. We also issue a quarterly Property and Law Round Up via our website to help inform CLC practices in their business planning.



## Transforming home buying and selling

For some years now we have been engaged closely with government as it has examined how to improve the home buying and selling process. Throughout 2019 we have continued to take a large role in the conversation that is being led by the Ministry of Housing, Communities and Local Government and HM Land Registry particularly through the work of the Home Buying and Selling Group.

In 2019, the CLC was the only regulator member of the Land Registry's Advisory Council and the Home Buying and Selling Group that brings together representatives of all of the key groups in the property transfer process. We are also part of the Transaction Reform Group bringing together conveyancers and estate agents.

We continue to work with the Bank of England as it progresses its review of the Real Time Gross Settlement system and look at payments more broadly as this holds out the prospect of major improvements in terms of the risks to client money.



## Research

Having undertaken a great deal of research in 2018, less was required in 2019. Our Annual Regulatory Return continues to provide a great deal of detailed insight not only into individual firms, but also wider market trends. It informs our assessment of risk and our business planning and allocation of resources. Our Diversity and Inclusion survey provided us with an insight into the make-up of the profession we regulate as well as providing a helpful benchmark against which to measure the progress of future activity.



## Supporting and preparing for innovation

The CLC is an active member of a range of forums that help to drive innovation in the legal sector and especially around conveyancing.

Our Director of Strategy and External Relations takes part in the Home Buving and Selling Group and our Deputy Director of Communications takes part in one of the sub-groups.

This degree of engagement has enabled us to support the development of some very promising ideas for improving the process, especially the idea of providing more information early on in the point of the sale process. That will now go into pilots in 2020 that we will help to facilitate.

We continue to develop useful working relationships with a wide range of IT providers and innovative entrepreneurs across the sector. The CLC has been able to put potential new entrants in touch with other key players who can advise them as they develop their work. This also helps us understand and prepare for the future of conveyancing and probate practice.

Also, and very importantly, Sheila Kumar leads coordination of the work of all of the front line regulators to improve information available to consumers making their choice of lawyer. As we move now to focus on what quality measures consumers might find useful, this work is entering an interesting and challenging new phase.



## **Regulatory Framework**

As a fully independent regulator, the changes made by the Legal Services Board to the Internal Governance Rules for all Approved Regulators have little direct impact on the CLC. However, in 2019 we took steps to ensure that we would achieve compliance with them without delay. The most significant measure was to codify our practice of appointing a lay person as Chair of the Council.

## Compliance



## Resolving issues quickly and efficiently, improving businesses





## Compliance

## Enforcement

The CLC watchlist is an internal document that tracks activity with firms that are under investigation or enhanced supervision as a result of concerns that have come to light through general monitoring activity, inspection visits, consumer complaints or intelligence received.

The work of the RSMs in 2019 has ensured that the average time spent on the watchlist by any one firm has remained short, consistent with previous years. Issues are being resolved promptly by being very clear to practices about our expectations coupled with active management of practices which are required to resolve compliance issues. The number of firms on the watchlist ranged between five and six during the year and a total of six practices appeared on the watchlist during 2019. 'Resolution' of an issue may mean either that the practice has successfully addressed the concerns identified by the CLC and is judged compliant with our requirements. Alternatively, it may mean that they have failed to do so and some form of disciplinary action has to be taken. In the event of disciplinary action short of a referral of an individual to the Adjudication Panel or an intervention into the firm, there is an accompanying plan to ensure that the entity continues to work to address the CLC's concerns. If they fail to do so, the matter will be escalated further as appropriate.

The watchlist is kept under regular review to ensure that the issues it records are resolved as quickly and efficiently as possible and to improve the clarity of reporting to the Senior Management Team and to the Council.



## Interventions and Managed Close Downs

The CLC intervened into, and closed down, three practices in the course of 2019. In all cases, the intervention was required to protect the interests of clients.

RSMs worked with three practices to ensure a managed close down while one other business was placed in creditors voluntary liquidation.

## **Conduct Complaints**

We received 202 complaints about CLC-regulated Lawyers/Practices in 2019.



#### **Adjudication Panel**

As the terms of office of the Chair and four Panel Members expired on 31 August 2019, following a competitive recruitment process, the Appointments Committee appointed 6 new members to the Adjudication Panel. These were a new Chair, two new Lay Members and three Professional Members. The CLC conducted a diversity monitoring exercise as part of the Adjudication Panel recruitment process and the results have been published on our website.

The Adjudication Panel sat three times in 2019: twice to hear disciplinary cases of breaches of the CLC Rules; and once to hear an applicant's request for a review of a Compensation Fund determination made by the CLC.



## **Publishing Disciplinary** Information

In line with the Publication Policy agreed by the Council in 2015, details of the Adjudication Panel hearings held in 2019 were published on the CLC's website. This included publishing the date, time and venue of disciplinary hearings in advance of the event.

The CLC also publishes the Adjudication Panel's determination following hearings; one of which has already been published, the second will be published in 2020.

During 2019 work was also completed to link Adjudication Panel determinations to the online register and findings will now display on the register.

## Governance

#### **Council Members 2019**

Dame Janet Paraskeva, Lay Chair of the Council Alan Cogbill, Lay Member of the Council Alex Clark, Professional Member of the Council (up to 30 April 2019) Andrea Pierce, Professional Member of the Council Colin Wilby, Lay Member of the Council Heather Foster, Lay Member of the Council Quinton Quayle, Lay Member of the Council Sally Szarka, Professional Member of the Council Sarah Debney, Professional Member of the Council Teresa Perchard, Lay Member of the Council Sheila Kumar, Chief Executive,

(became a full Member with effect from 31 October 2019)

Ensuring we are a well run organisation the CLC Council has responsibility for oversight of all regulatory functions vested in the CLC 1985 and the Legal Services Act 2007. It takes decisions on the financial management of the organisation and sets the strategic direction and priorities, oversees the standards of entry into the profession and maintenance of the ethical conduct and quality standards of licensed practices and practitioners. More information is provided in our Annual Financial Statements and Corporate Governance Framework that can be found on the CLC website.

Council business is transacted at formal meetings of the Council. Council members also meet to discuss and explore emerging policy and strategy formulation in Council workshops.

The Council has continued to work with an independent advisor to support the Council's effectiveness and the formal Council meeting agenda has been streamlined to provide a greater focus on strategic

priorities. An audit of the balance of skills, knowledge and expertise represented on the Council commenced towards the end of the under the Administration of Justice Act year and will inform future succession planning arrangements.

> The CLC seeks to follow the Financial Reporting Council's UK Corporate Governance Code where it is appropriate and relevant to do so. Whilst it is not a statutory requirement, we see it as a framework for good governance.

In line with best practice, the Audit and Risk Committee completed a biennial assessment of its effectiveness during 2019. In addition to the risk management policy, which has been developed to formalise and support the risk management process, the Audit and Risk Committee has reviewed the principal risk register at its meetings and the actions being taken to address or mitigate identified risks. The external auditors, who provide an independent review of the CLC's systems of internal control and financial statements attended meetings of the Audit and Risk

Committee and Council to present their annual opinion in relation to the financial year 2018.

The CLC commissions a regular cycle of internal audit inspections to provide independent assurance that our risk management, governance and internal control processes are operating effectively. The findings of these inspections are reported to the Audit and Risk Committee. During 2019, the following internal audits took place:

- Professional Disciplinary Process
- Governance
- New Education Provision
- Licensing of new practices
- Follow up to previous internal audit inspections

For the third year running, our independent internal auditors, RSM, have given an opinion on the CLC that is the highest available, saying that the CLC 'has an adequate and effective framework for risk management, governance and internal control."

The CLC has published a Register of Council Member's Interests on our website, in line with the Standard Principles of Public Life Council Members are required to disclose direct or indirect pecuniary or other interests which may, in reality or appearance, influence their judgement. In addition, the CLC has made the decision to publish declared interests of its Senior Management Team.

## **Data Protection**

During 2019 there was one internal notification of potential to access sensitive data on a shared drive accessed by CLC staff. The data was removed from the shared drive and staff were reminded of the requirement for confidential correspondence which includes confidential and/or sensitive data to be password protected.

## The Council has 3 Standing Committees:

#### **Audit and Risk Committee Members**

Heather Foster – Chair (lay member) Sarah Debney – Professional member (with effect from May 2019) Richard Cryer – Independent member (Reappointed for a further three year term in January 2019) Teresa Perchard – Lay member Andrea Pierce – Professional Member

The Audit and Risk Committee supports the Council's responsibilities in the area of risk, control, governance and associated assurance.

## **Remuneration Committee Members**

Colin Wilby – Chair (Lay member) Quinton Quayle – Lay member Alan Cogbill – Lay member Sarah Debney – Professional Member

The Remuneration Committee supports the Council's responsibilities in the area of remuneration, recruitment and retention of staff, Council and Committee members.

## **Appointments Committee Members \***

Dame Janet Paraskeva (Chair) (Lay member) Andrea Pierce - Professional member Colin Wilby – Lay member

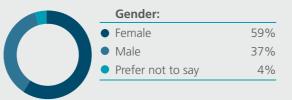
The Appointments Committee is responsible for appointment of Non-Executive Directors, the Chief Executive, Adjudication Panel members and, where required, other senior staff. In planning for succession of Council members and senior officers, it has regard to equality, diversity and inclusion considerations to ensure that the Council has an appropriate balance of skills, experience, independence and knowledge on which to draw. During 2019 the Appointments Committee met to discuss succession planning arrangements and to determine appointment of Adjudication Panel members who are independent of the CLC.

\*Members of the Appointments Committee do not participate in decisions which relate to themselves. Where a member of the Appointments Committee cannot attend a meeting, it may co-opt alternative member(s) provided that the composition of the Committee retains a lay majority. There have been no co-options in 2019.

## Diversity of the Council, its workforce and appointments

CLC Staff and Council members







Nationality:	
• UK	85%
• EU	7%
<ul> <li>Rest of the world</li> </ul>	15%
<ul> <li>Prefer not to say</li> </ul>	4%



This data was extracted from the CLC's Diversity Monitoring Survey. The full findings have been published on the CLC's website.



Manager M,
Admin W,
25%

• Admin W,

Governance





## Appendix

## CLC's approach to regulation

The CLC aims to help its regulated community to achieve compliance with legal and regulatory obligations. We encourage practices to work in new ways to meet customer needs and grow their businesses. We help businesses understand how they can meet the appropriate regulatory outcomes and discourage tick box compliance. We find this is the best way of protecting and promoting consumer protection, and ensuring consumers have choice.

We pride ourselves on having a good understanding of the businesses that we regulate. We aim to have a detailed and rounded view of their activities so that we have a global understanding of the particular risks they might face. Every CLC practice has a nominated Regulatory Supervision Manager (RSM) who acts as the key point of contact, especially in the first year of regulation. This starts with very close supervision of new businesses in the first years of their regulation by the CLC. Our concern then is not simply with regulatory compliance but also with financial stability and health because unsound businesses also present a threat to the consumer and public interest. We aim to work in close partnership with the firms so that they succeed and are compliant.

The CLC proceeds on the basis that prevention is better than cure and we use a wide range of approaches and tools to support regulated businesses, ensure compliance and take corrective or disciplinary action where it is necessary. This range of approaches give us a choice of regulatory responses that are proportionate to the risk to clients in any particular case.



## Maintaining the health of the profession

When new businesses are established under CLC regulation for the first time they will have satisfied us that they have in place the appropriate processes and resources to deliver compliant legal services and manage the risks associated with the legal services they provide in line with our regulatory requirements. They will have presented a plan that identifies and mitigates the risks associated with the provision of the legal services they propose to offer and setting out their roadmap for a sustainable business. We will also have conducted necessary checks on the businesses owners and managers. All of these aspects are monitored closely at the beginning of the firm's life.

## **Close Initial Support** and Supervision

Before a new business is authorised, the Licensing Team at the CLC will have met the managers of the business to discuss their plans in detail. This takes place at an early stage, to help ensure that submitted applications take full account of our requirements. This helps ensure that we and the applicants do not waste time dealing with incomplete or insufficient applications. Some applicants will find at this stage that CLC regulation is not right for them or may take time to think more about their plans and how they might need to change in order to meet our requirements for consumer protection.

In order for CLC to process applications it will need to understand how the Practice intends to operate, and has, or knows how to, put in place the appropriate corporate policies and procedures to demonstrate to the CLC that it will act responsibly and fairly in its dealings with clients and all third parties.

All new CLC-regulated businesses will be met twice during their first year of operation for an initial monitoring visit and later an inspection to ensure that the systems and processes they have in place are being followed and that they are achieving compliance with the CLC's Handbook.





## **Annual Checks**

After the early period of regulation of a new business, we use a mix of self-reporting, third-party reports, desk-based supervision and inspection visits to monitor the all-round health of the profession. The key points in the regulatory year are:

- Submission of accountants' reports – in line with the business's audit year.
- Licence renewal
- For individuals in October each year individuals must inform us of any change in circumstances that might affect their right to a licence for the coming year beginning 1st November
- For businesses also in October, a licensed Manager must confirm that there is no issue that might affect the business's licence to practise.
- Annual Regulatory Return Each business is required to provide a response to a questionnaire that probes a range of areas to understand ongoing or emerging risks within the practice and across the sector as a whole.

Concerns raised in accountants' reports may give rise to requirements on the business to address shortcomings in their management of client funds. If so, a timescale will be set and compliance monitored until the CLC is satisfied.

## Licence renewal is an automated and speedy, but not automatic process. If the CLC has concerns about an individual or business, we may decide

to hold over renewal of a licence until the issue has been addressed or a timetable for its correction is agreed. Licences may also be issued with conditions that need to be met by the individual or business to ensure retention of that licence.

Data from the Annual Regulatory Return may give rise to further regulatory action in relation to a specific business or highlight the need for more general action such as enhanced or clarified guidance to the profession or new CPD requirements in relation to specific issues. It also provides an understanding of changes in the profession as a whole.



## **Monitoring Inspections**

In addition to the desk-based monitoring that is set out above we undertake a programme of on-site inspections of regulated businesses each year. The bulk of inspections each year will be arranged because of the time that has elapsed since the practice last had a monitoring inspection. Each practice will be inspected at least once every three years.

Additional visits are arranged in light of specific issues that we have identified with firms and where desk- based supervision is judged to be insufficient. Others will be riskbased, in other words, we will not be aware of a specific issue, but have concerns about the business's risk profile that merit a closer look. (That might be because the firm undertakes a significant amount of transactions in which they act for both sides, for example, or are disproportionately dependant on one client).



## **Other Intelligence**

The CLC may also receive information about a regulated business or individual from another regulator, The Legal Ombudsman or a mortgage lender as well as an employee, colleague or client. In such cases, the matter will be addressed directly with the firm or individual until the CLC is satisfied that they are in compliance or may lead to some kind of disciplinary action. Conduct complaints may, following investigation, also give rise to some form of compliance assurance or disciplinary action, as appropriate.



#### Working with Financial Institutions

We engage with mortgage lenders on a range of issues that relate to the work the regulated community does for and with them. Their panel management approaches can offer useful insight into the conveyancing market place for us at an aggregate level and, where there might be problems, with an individual practice that we regulate.

As a regulator, we do not advocate for panel access for an individual firm, but we wish to ensure that there are no unfair barriers to market entry or access. We are pleased that lending institutions have responded so positively when we have had to address the issue with them.

## **Disciplinary Action**

Where an individual or business fails to achieve compliance to the satisfaction of the CLC, for example, where there is evidence of misconduct or where there is clear evidence of risk to the consumer. the CLC can refer the matter to the independent Adjudication Panel. The Adjudication Panel, will set an appropriate sanction.

To support transparency we publish on our website guidelines that were developed for the Adjudication Panel to assist in applying sanctions. The guidelines do not impinge on the independence of the Adjudication Panel and have been made public to assist the profession and other stakeholders.



## **Equality, Diversity** and Inclusion

All CLC -regulated entities must comply with the Equality Act as employers and service providers, as must the CLC itself. Our efforts to improve equality, diversity and inclusion (EDI) within the regulated community and in relation to the treatment of clients has been significantly mainstreamed within our regulatory work for some time. All policy proposals are assessed for their EDI impact and especially for any negative impact on protected groups. Our diversity survey tracks the particular challenge of progress from entry to managerial roles of women and BAME lawyers and support staff in the practices that we regulate.

Additionally, to support individuals and employers better, we are working with the other front line regulators to share insight, ideas and best practice.

The CLC is a funder of LawCare, the charity which supports and promotes good mental health and wellbeing right across the legal community. We promote its services and encourage staff in regulated practices to know they can make use when needed. We wish to help create mentally healthy legal workplaces.

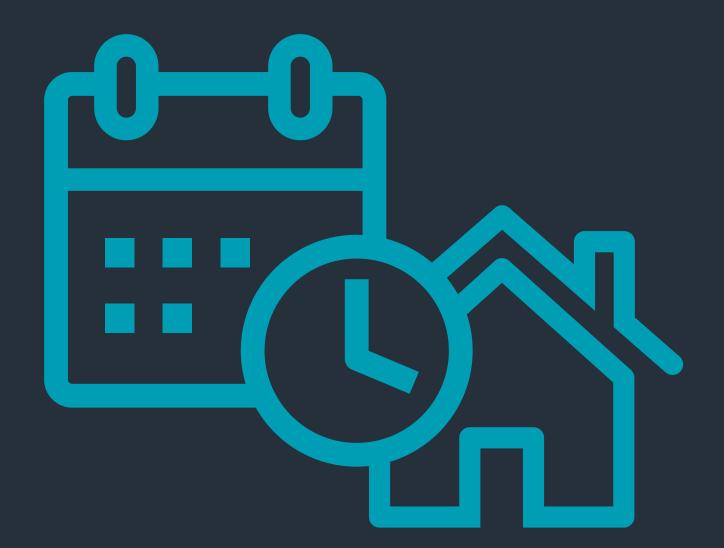


## **Our Strategy**

**Empower consumers to make informed choices** of conveyancing and probate lawyers

Adapt regulation to the changing market

Be the regulator of choice in our specialist areas



Regulating Property And Probate Lawyers

**Contact us** For enquiries, please use the details below.

We are open Mon-Fri, 8am-5pm.

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